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January 24, 2014

RECEIVED

JAN 30 2014

CALIFORNIA
COASTAL COMMISSION

California Coastal Commission
c/o Sea-level Rise Work Group
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Re: Draft Sea Level Rise Policy Guidance document and coastal agriculture
on the North Coast

Dear Commissioners and Sea-level Rise Work Group,

The Northcoast Regional Land Trust (NRLT) is dedicated to the protection and economic viability of working lands—farms, forests, and grazing lands—and to the preservation and protection of land for its natural, educational, scenic, and historic values. For the last 13 years NRLT has been implementing a balanced approach to protecting and enhancing coastal resources, including agriculture, wetlands, fisheries, public access, education and recreation.

The Coastal Act specifically calls for the protection of agricultural lands (Chapter 3) along with other coastal resources. These agricultural lands constitute a vital economic, environmental, and cultural asset to local communities of the North Coast and the state of California. Locally, these lands generate millions of dollars for the economy each year; they provide hundreds of jobs for local community members; they provide freshwater wetlands habitat for migratory songbirds and waterfowl; and they provide scenic open space that contributes to the rural character of the region. Agricultural lands are among the most valuable and important coastal resources that could be lost or degraded as a result of sea level rise.

For over 100 years now many of these agricultural lands have been protected from flooding and tidal inundation by a network of levees and dikes. In the face of rising sea levels, landowner-initiated efforts to rehabilitate and raise these structures are a practical method for protecting agricultural lands. While people will certainly disagree on how long levees and dikes can effectively protect agricultural lands against sea level rise, it appears those structures will provide significant benefits for at least 20 or 30 years or more. Much of the

rehabilitation work can be done without armoring the structures—relying on just soil fill—and would therefore be more or less impermanent if future sea levels render the protective structures obsolete. We encourage the Commission to support policies that make it feasible for landowners to easily and affordably protect their agricultural lands, particularly former tidelands, using reasonable practices in the rehabilitation of levees and dikes. NRLT supports the concept of a waiver program or region-wide, programmatic permitting program (such as a consistency determination perhaps issued to the Natural Resources Conservation Service) that clears the way for North Coast landowners to conduct such activities. A successfully implemented program would minimize regulatory compliance costs for landowners and ensure standard practices for minimizing impacts to other coastal resources.

Regarding the draft sea level rise guidance document, we request two things:

1) Agricultural lands should be explicitly identified in the Guiding Principles (Section 2C) as a priority coastal resource that deserves maximum protection, along with public access, recreation, sensitive habitats, and other coastal resources specified in that section; and 2) the document should recognize the protective value of existing levees and dikes (as it does with natural sand dunes in Section 4.5) and explicitly support policies that make it easy and affordable for landowners to rehabilitate those structures, particularly on former diked tidelands, including the widening of bases where necessary to raise the elevation of dikes, in response to sea level rise.

NRLT would be glad to answer any questions this letter raises.

Thank you for considering these comments and incorporating them into the final sea level guidance document.

Sincerely,



Michael Cipra
Executive Director